

Arnold & Porter

Louis S. Ederer
+1 212.836.8144 Direct
Louis.Ederer@arnoldporter.com

March 15, 2018

VIA ECF & E-MAIL

Hon. Katherine B. Forrest
United States District Judge
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007-1312

Re: Global Brand Holdings, LLC v. Church & Dwight Co., Inc., Case No. 17-cv-6571

Dear Judge Forrest:

We respectfully submit this joint letter application in the above action on behalf of both Plaintiff and Defendant. The parties hereby request a brief extension of the fact discovery and expert phases of the Scheduling Order (Dkt. No. 23).

The parties have been working diligently to complete fact discovery by the current close date of April 13, 2018. However, as the Court is aware, the parties have had some issues with respect to the scope of document discovery, and there are additional productions still to be made. The requested extension period will give the parties the ability to resolve as many of their disputes as possible, in order to avoid further burdening the Court; to complete their respective document productions; and to conduct a number of party and third party depositions which they are in the process of scheduling. In short, the proposed extension will allow the parties to complete all fact discovery in good order by the extended date of April 30, 2018, and then proceed to the remaining phases of the case.

The dates contained in the existing Scheduling Order, and the proposed extended dates, are set forth below. The motion phase and trial dates remain the same:

Event	Existing Date	Proposed Date
Close of Fact Discovery	April 13, 2018	April 30, 2018
Initial Expert Reports	April 27, 2018	May 14, 2018
Rebuttal Expert Reports	May 25, 2018	June 11, 2018
Close of Expert Discovery	June 15, 2018	June 29, 2018
Motions:		
Opening:	June 29, 2018	June 29, 2018
Opposition:	July 20, 2018	July 20, 2018
Reply:	July 27, 2018	July 27, 2018
Trial:	September 12, 2018	September 12, 2018

So ordered.
108.7
4505
3/16/18

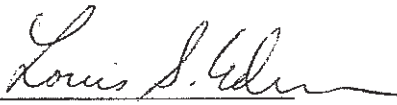
Hon. Katherine B. Forrest
March 15, 2018
Page 2

The parties have not made any prior requests for an adjournment or extension of the Scheduling Order.

We thank the Court for its consideration.

Respectfully submitted,

ARNOLD & PORTER

By: 
Louis S. Ederer

cc: Brendan J. O'Rourke, Esq.
Proskauer Rose LLP